

FILED

November 13, 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES DISTRICT COURT

for the

Western District of TexasBY: Joseph Hinojos
DEPUTY

United States of America

v.

Case No. **PE: 23-MJ-639**

Daniel ALVIDREZ Gonzalez (1)

Octavio FRIAS Quezada (2)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/6/2023 in the county of Presidio in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. §554
(1-2)

The defendants, aided and abetting by each other, did knowingly attempt to export merchandise, to wit: firearms and ammunition, from the United States into Mexico, contrary to law and regulation.

This criminal complaint is based on these facts:

☐ Continued on the attached sheet.

Complaint sworn to in my presence and signed electronically on this date.

FED.R.CRIM.P. 4.1(b)(2)(A)

COLEMAN S BORING Digitally signed by COLEMAN S BORING
Date: 2023.11.09 13:16:31 -06'00'*Complainant's signature*

SIGNED FOR: Fernando Juarez, HSI Special Agent

*Printed name and title*Date: 11/13/2023City and state: Alpine, Texas*Judge's signature*

United States Magistrate Judge David Fannin

Printed name and title

Affidavit

On November 6, 2023, at approximately 10:00 p.m., Customs and Border Protection (CBP) officers encountered Daniel ALVIDREZ Gonzalez and Octavio FRIAS Quezada while conducting outbound inspections at the Presidio Port of Entry. The outbound inspection area is situated where drivers are committed to exit the United States and drive into Mexico.

CBP Officers selected four vehicles traveling in tandem for inspection. A Ford F250 driven by ALVIDREZ was reported stolen. A white Chevrolet 1500 driven by FRIAS contained two .22 caliber rifles, one .22 caliber handgun and 3268 rounds of .22 caliber ammunition.

Homeland Security Investigations Special Agent (SA) Fernando Juarez and SA Woody Raven responded to assist. SA Juarez read ALVIDREZ his Miranda Rights. ALVIDREZ stated he understood his rights and provided a statement. ALVIDREZ said he entered into an agreement to purchase firearms and ammunition for an individual in Mexico. ALVIDREZ added he went to Cabela's in Rapid City, South Dakota and purchased two .22 caliber rifles and one .22 caliber handgun plus several boxes of ammunition. ALVIDREZ said he gave the firearms and ammunition to Co-Defendant Octavio FRIAS Quezada after he agreed to transport them into Mexico. ALVIDREZ refused to transport the firearms into Mexico because he could get into legal problems.

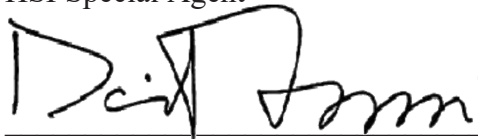
SA Juarez read FRIAS his Miranda Rights. FRIAS stated he understood his rights and provided a statement. FRIAS said ALVIDREZ purchased the firearms on behalf of his father, who lives in Mexico. FRIAS agreed to transport the firearms out of the United States and deliver them in Mexico. FRIAS said he loaded the firearms and ammunition into his truck and that he was taking the firearms to Tatuaca, Chihuahua, Mexico. FRIAS added he did not declare the firearms at the Presidio POE because he did not want to get in trouble.

I make this affidavit based on my personal knowledge and information furnished to me by other law enforcement officers for the purpose of establishing probable cause.

COLEMAN S BORING

Digitally signed by COLEMAN S
BORING
Date: 2023.11.09 13:57:47 -06'00'

Signed For: Fernando Juarez
HSI Special Agent



David Fannin
United States Magistrate Judge